

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TRUEPOSITION, INC.)	
)	
Plaintiff,)	
)	
vs.)	Case No. 2:11-cv-4574 (RK)
)	
LM ERICSSON TELEPHONE COMPANY,)	
)	
QUALCOMM INC.,)	
)	
ALCATEL-LUCENT USA INC.,)	
)	
and)	
)	
THIRD GENERATION PARTNERSHIP)	
PROJECT a/k/a 3GPP)	
)	
Defendants.)	
_____)	

JOINT STATUS REPORT

The parties hereby jointly submit to the Court this report as to the status of two provisions of the Discovery Plan approved and adopted by the Court on December 20, 2012.

C. Electronically Stored Information.

The parties have exchanged several rounds of a draft stipulation governing the production and handling of electronically stored information, and have held a “meet and confer” teleconference concerning the draft proposals. The parties have made substantial progress in narrowing the issues, and believe that a limited additional period to confer and consider counter-proposals would succeed in narrowing or eliminating issues before presenting the final draft stipulation to the Court. The parties currently anticipate presenting to the Court on or before

January 22, 2013, the joint stipulation and the identification of any issues remaining for resolution by the Court as described in paragraph C of the Discovery Plan.

F. Protective Order.

The parties have exchanged several rounds of a draft protective order governing the production and handling of Protected Information, and have held several “meet and confer” teleconferences and email exchanges concerning the draft proposals. The parties have made substantial progress in narrowing the issues, and believe that a limited additional period to confer and consider counter-proposals would succeed in narrowing or eliminating issues before presenting the final documents to the Court. The parties anticipate presenting to the Court on or before January 9, 2013, the joint proposed Protective Order, along with a document that identifies the few issues remaining for resolution by the Court and summarizes the parties’ respective provisions concerning each issue, as described in paragraph F of the Discovery Plan.

Dated: January 4, 2013

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Evelyn R. Protano, hereby certify that on January 4, 2013, I caused a true and correct copy of the Joint Status Report to be served upon the following by ECF and electronic mail:

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